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7 Attorneys for Defendant

Lead Intelligence, Inc.

8  
9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**

11 **Loretta Williams**, individually and on behalf  
12 of all others similarly situated,

13 Plaintiff,

14 v.

15 **DDR Media, LLC, and Lead Intelligence,**  
16 **Inc.**

17 Defendants.

Case No. 3:22-cv-03789-SI

**STIPULATION REGARDING BRIEFING  
SCHEDULE**

Judge: Hon. Susan Illston

1 Plaintiff Loretta Williams (“Plaintiff” or “Williams”) and Defendants DDR Media, LLC  
2 (“DDR Media”) and Lead Intelligence, Inc. d/b/a Jornaya (“Jornaya,” and collectively with DDR,  
3 “Defendants”) hereby stipulate as follows:

4 WHEREAS, Royal Marketing filed a motion to dismiss on April 12, 2023;

5 WHEREAS, Jornaya filed a motion to dismiss on April 13, 2023;

6 WHEREAS, the Court granted the motions to dismiss on August 18, 2023, giving Plaintiff  
7 leave to amend; and

8 WHEREAS, Plaintiff filed a Second Amended Class Action Complaint on September 20,  
9 2023;

10 NOW THEREFORE, the Parties jointly seek the approval of the Court to extend the  
11 schedule for Defendants to respond to the Second Amended Class Action Complaint as follows:

12 1. Defendants shall have until November 3, 2023 to answer or otherwise respond to the  
13 Second Amended Class Action Complaint;

14 2. If Defendants file motions to dismiss the Second Amended Class Action Complaint,  
15 Plaintiff shall have until December 3, 2023 to respond to the motion; and

16 3. Defendants shall have until December 18, 2023 to file a reply in support of any  
17 motion to dismiss the Second Amended Class Action Complaint.

18  
19 **IT IS SO STIPULATED.**

20  
21 Respectfully submitted,

22 Dated: October 3, 2023

**LORETTA WILLIAMS**, individually and on  
behalf of all others similarly situated,

23  
24 By: /s/ Patrick H. Peluso

25 Rebecca Davis (SBN 271662)  
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16 *Counsel for Plaintiffs*

17 Dated: October 3, 2023

18 **LEAD INTELLIGENCE, INC. D/B/A**  
19 **JORNAYA**

20 By: /s/ Rebecca Harlow

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*Counsel for Jornaya*

1 Dated: October 3, 2023

**DDR MEDIA, LLC d/b/a Royal Marketing  
Group**

2 By: /s/ Joseph A. O'Keefe

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*Counsel for Defendant DDR Media  
d/b/a Royal Marketing Group*


10  
11 Any Motion to Dismiss the Second Amended Class Action Complaint Hearing will be  
12 noticed for January 12, 2024 at 10 a.m.

13 The Initial Case Management Conference is continued to February 9, 2024.

14 **IT IS SO ORDERED.**

15 Date: October 4, 2023

16 By: \_\_\_\_\_

  
Hon. Susan Illston  
U.S. DISTRICT JUDGE

**SIGNATURE CERTIFICATION**

Pursuant to Civil L.R. 5-1(i)(3) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to counsel for Defendant and that I have obtained authorization to affix his or her electronic signature to this document.

By: /s/ Rebecca Harlow  
Rebecca Harlow

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above papers was served upon counsel of record by filing such papers via the Court's ECF system on October 3, 2023.

/s/ Rebecca Harlow

Rebecca Harlow